

FERRAIUOLI, LLC  
390 N. Orange Avenue  
Suite 2300  
Orlando, Florida 32801  
Telephone: (407) 982-7310  
Facsimile: (787) 766-7001  
Email: [scolon@ferraiuoli.com](mailto:scolon@ferraiuoli.com)  
Email: [gchico@ferraiuoli.com](mailto:gchico@ferraiuoli.com)

Attorneys for *Santa Rosa Mall, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,  
  
Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**SANTA ROSA MALL'S CERTIFICATE OF SERVICE OF CREDITOR'S  
SUBPOENA DUCES TECUM DIRECTED TO SEARS HOLDINGS CORPORATION**

TO THE HONORABLE COURT:

COMES NOW Santa Rosa Mall, LLC ("Santa Rosa Mall"), by and through its undersigned counsel, and respectfully states and prays as follows:

1. On February 1, 2019, Santa Rosa Mall issued *Creditor's Subpoena Duces Tecum* (the "Subpoena") directed to Sears Holdings Corporation (collectively, the "Debtors") and to the care of Candance Arthur, Esq. ("C. Arthur" or "Debtors' counsel"), an associate attorney at Weil, Gotshal & Manges LLP, to produce and permit the inspection and copying of the documents specified on Exhibit "A" thereto, at the New York offices of Ferraiuoli LLC on February 11, 2019, at 10:00 AM. A copy of the *Creditor's Subpoena Duce Tecum* is attached hereto as **Exhibit A**.

2. On even date, February 1, 2019, at 2:43 PM and 2:54 PM, the undersigned counsel communicated with C. Arthur as to whether the Debtors would accept service of the *Subpoena* by email. A copy of the electronic communication exchanged is attached hereto as **Exhibit B**.

3. By email dated February 1, 2019, at 8:10 PM, C. Arthur accepted service of process of the

*Subpoena* on behalf of the Debtors. See Exhibit B.

4. For the forgoing reasons, Santa Rosa Mall cancelled the personal service of process and returns the *Subpoena* as unexecuted.

WHEREFORE, Santa Rosa Mall respectfully requests this Court takes notice of the forgoing, accepts the service of process of *Creditor's Subpoena Duces Tecum*, and grant any other remedy that is fair and equitable.

Respectfully submitted.  
Dated: February 7, 2019.

**Ferraiuoli** LLC  
221 Ponce de León Avenue  
5th Floor  
San Juan, PR 00917

PO Box 195168  
San Juan, PR 00919-5168  
Telephone: (787) 766-7000  
Facsimile: (787) 766-7001

-and-

390 N. Orange Avenue  
Suite 2300  
Orlando, Florida 32801  
Telephone: (407) 982-7310  
Facsimile: (787) 766-7001

/s/ Sonia E. Colon Colon  
Sonia E. Colón Colón  
Admitted *Pro Hac Vice*  
USDC-PR No. 213809  
[scolon@ferraiuoli.com](mailto:scolon@ferraiuoli.com)

/s/ Gustavo A. Chico-Barris  
Gustavo A. Chico-Barris  
NY State Bar No. 929147  
USDC-PR No. 224205  
[gchico@ferraiuoli.com](mailto:gchico@ferraiuoli.com)

Attorneys for  
*Santa Rosa Mall, LLC*